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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY.

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

**Bankruptcy Case
No. 19-30088 (DM)**

Chapter 11 (Lead Case) (Jointly Administered)

**STIPULATION BETWEEN DEBTOR
PACIFIC GAS AND ELECTRIC
COMPANY AND MOVANT CARA
FENEIS FOR LIMITED RELIEF FROM
THE AUTOMATIC STAY**

[Relates to Dkt. Nos. 5207 – 5207-5]

[Regarding Motion Set for Hearing
January 29, 2020 at 10:00 am]

This stipulation (the “**Stipulation**”) is entered into by and between Pacific Gas and Electric Company (the “**Utility**” or the “**Debtor**”), as debtor and debtor in possession, and movant Cara Feneis. (“**Feneis**”). The Debtor and referred to in this Stipulation collectively as the “**Parties**,” and each as a “**Party**.¹” The Parties hereby stipulate and agree as follows:

RECITALS

A. On December 26, 2019, Feneis filed the *Motion for Relief from Automatic Stay to Permit State Court Jury Trial of Cara Feneis v Pacific Gas and Electric Company* [Dkt. 5207-1] (the “**Motion**”). The Motion is scheduled for the hearing on January 29, 2019, at 10:00 am (the “**Hearing**”).

B. Debtors have not yet filed an opposition to the Motion, but intend to do so should the Motion proceed to hearing.

C. In the Motion, Feneis seeks relief from the automatic stay to prosecute her claims in the case pending in the Alameda County Superior Court (the “**State Court**”), *Cara Feneis v. Pacific Gas and Electric Company, et al.*, Case No. RG17866484 (the “**Feneis Action**”).

D. Feneis filed the Feneis Action on July 5, 2017. Her complaint alleges claims against the Utility for wrongful termination, age and sex discrimination, and retaliation in violation of California Labor Code § 1102.5(b).

E. The Utility filed its answer, denying all allegations, on September 25, 2017.

F. The Debtor and its parent, PG&E Corporation (collectively the “**Debtors**”), filed these Chapter 11 Cases on January 29, 2019 (the “**Petition Date**”).

G. On January 30, 2019, the Debtors filed a *Notice of Bankruptcy Filing and Imposition of Automatic Stay* in the Feneis Action based on these Chapter 11 Cases.

NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND
BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES
JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. This Stipulation shall be effective upon entry of an order by this Court approving it.

2. The Hearing shall be taken off calendar.

1 3. The Parties agree to engage in a formal mediation (the “**Mediation**”) to
2 attempt to settle their disputes that are the subject of the Feneis Action. The Parties will retain a
3 mutually acceptable mediation neutral – Lynn Frank, if she is available – to conduct the Mediation,
4 which will be scheduled for a mutually agreeable date and place.

5 4. The automatic stay shall immediately be modified, to the extent necessary,
6 to permit the Parties to engage in the Mediation described in para. 3 above. The automatic stay
7 shall remain in place for all other purposes.

8 5. If the Parties’ settlement efforts, including the Mediation, do not result in a
9 settlement between Utility and Feneis, Feneis may put the Motion back on calendar on at least 21
10 days’ notice.

11 6. This Court shall retain jurisdiction to resolve any dispute regarding, and to
12 enforce, the terms of this Stipulation and the order approving it.

14 Dated: January 17, 2020

15 WEIL, GOTSHAL & MANGES LLP
16 KELLER & BENVENUTTI LLP

17 _____
18 /s/ *Peter J. Benvenutti*

19 Peter J. Benvenutti

20 *Attorneys for Debtors
21 and Debtors in Possession*

14 Dated: January 17, 2020

15 PERETZ & ASSOCIATES

17 _____
18 /s/ *Yosef Peretz*

19 Yosef Peretz

20 *Attorneys for Cara Feneis*